

1 Anna Y. Park, CA SBN 164242  
2 anna.park@eeoc.gov  
3 Nakkisa Akhavan, CA SBN 286260  
4 nakkisa.akhavan@eeoc.gov  
5 Andrea Ringer, CA SBN 307315  
6 andrea.ringer@eeoc.gov  
7 Derek Li, CA SBN 150122  
8 derek.li@eeoc.gov  
9 U.S. EQUAL EMPLOYMENT  
10 OPPORTUNITY COMMISSION  
11 255 East Temple Street, Fourth Floor  
12 Los Angeles, CA 90012  
13 Telephone: (213) 785-3080  
14 Facsimile: (213) 894-1301

15 Attorneys for Plaintiff  
16 U.S. EQUAL EMPLOYMENT  
17 OPPORTUNITY COMMISSION

18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 U.S. EQUAL EMPLOYMENT  
21 OPPORTUNITY COMMISSION,

22 Plaintiff,  
23 vs.

24 NEVADA RESTAURANT SERVICES, INC.,  
25 and DOES 1-10, inclusive,

26 Defendants.  
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28 Case No.: 2:23-cv-01307-GMN-NJK

**JOINT NOTICE OF SETTLEMENT; AND  
SECOND STIPULATION FOR A STAY OF  
PROCEEDINGS TO FINALIZE CONSENT  
DECREE; ORDER**

**(SECOND REQUEST FOR A STAY)**

1 TO THE HONORABLE DISTRICT JUDGE AND MAGISTRATE JUDGE:

2 Plaintiff U.S. Equal Employment Opportunity Commission and Defendant Nevada  
 3 Restaurant Services, Inc. (collectively “Parties”), by and through their counsel of record, jointly  
 4 file this Notice of Settlement and second stipulation to stay proceedings.

5 On December 12, 2024, the court granted the Parties’ stipulation to stay proceedings for a  
 6 period of ninety days for a mediation in February 2025 to resolve the case. (ECF No. 48).

7 On February 27, 2025, the Parties, through mediation, reached agreement on a monetary  
 8 settlement. The Parties will need additional time to finalize the language of a proposed Consent  
 9 Decree and Order for the Court’s consideration, approval, and entry. The Parties anticipate  
 10 submitting the proposed Consent Decree and Order within forty-five (45) days. If the proposed  
 11 Consent Decree and Order are not filed within forty-five (45) days of the Order, the Parties shall  
 12 file a Joint Status Report Regarding Settlement.

13 In the interest of preserving costs for continuing discovery and trial preparation and in the  
 14 interest of judicial economy, the Parties respectfully request that the Court retain jurisdiction to  
 15 enter decree and stay the proceedings for forty-five (45) days from the date of the Order to allow  
 16 the Parties to finalize and to submit the Consent Decree and Order for the Court’s approval and  
 17 entry.

18 Dated: March 5, 2025

U.S. EQUAL EMPLOYMENT  
 OPPORTUNITY COMMISSION

20 By: /s/ Derek W. Li

Derek W. Li  
 EEOC Trial Attorney

22 Dated: March 5, 2025

NEVADA RESTAURANT SERVICES, INC.

24 By: /s/ Richard J. Mrizek

Kirsten A. Milton, ESQ.  
 Richard J. Mrizek, ESQ.  
 JACKSON LEWIS P.C.  
 Attorneys for Defendant  
 Nevada Restaurant Services, Inc.

1                   **[PROPOSED] ORDER**  
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5                   **IT IS SO ORDERED.**  
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9                   Dated this \_\_\_\_ day of March, 2025  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT JUDGE